

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

Mondrea Vinning-El, #B63459,)	
)	
Plaintiff,)	Case No. 05-cv-570-DRH
)	
vs.)	Hon. David R. Herndon
)	
John D. Evans, et al.,)	
)	
Defendants.)	

MOTION TO CONTINUE TRIAL AND REOPEN DISCOVERY

For the reasons stated in the accompanying Plaintiff's Memorandum in Support of Motion to Continue Trial and Reopen Discovery, plaintiff Mondrea Vinning-El moves to continue trial for 120 days and to file a trial brief fourteen days prior to the new date, as well as to reopen discovery. Specifically, plaintiff seeks the following discovery:

- (1) Depositions of persons with knowledge regarding the claims and defenses in this case;
- (2) Document requests and requests for admission related to the claims and defenses in this case or related to Defendant Sutton's communications or actions regarding actions taken by inmates to adhere to their religious beliefs;
- (3) Interrogatories related to the same subject matters described in (2), where plaintiff has up to 11 interrogatories to serve upon Defendant Sutton;
- (4) Discovery from third parties, such as prison officials at IDOC facilities other than Pinckneyville, that is related to the claims and defenses in this case,
- (5) Retention of expert witnesses on plaintiff's religious beliefs and the injuries and damages related to his claims.

During a meet-and-confer, defendant's attorney conveyed that he opposed this motion.

WHEREFORE, for the reasons provided in the accompanying Memorandum, Plaintiff respectfully request that the Court continue the trial and reopen discovery.

Dated: June 13, 2012

Respectfully submitted,

/s/ Vikas K. Didwania

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing MOTION TO
CONTINUE TRIAL AND REOPEN DISCOVERY was filed electronically on this 13th
day of June 2012, and will, therefore, be served electronically upon:

Joseph N. Rupcich
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62706

/s/ Vikas K. Didwania
Vikas K. Didwania